



# EMPLOYEE HANDBOOK

## 2021-2022



VITALCOREHS.COM

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## Welcome from our Chief Executive Officer



### Welcome to VitalCore Health Strategies!

We are delighted that you have chosen to join our organization and hope that you will enjoy a long and successful career with us. As you become familiar with our culture and mission, we hope you will take advantage of opportunities to enhance your career and further VitalCore Health Strategies' goals.

You are joining an organization that has a reputation for outstanding leadership, innovation, and expertise. Our employees use their creativity and talent to invent new solutions, meet new demands, and offer the most effective services/products in the industry. With your active involvement, creativity, and support, VitalCore Health Strategies will continue to achieve its goals. We sincerely hope you will take pride in being an important part of VitalCore Health Strategies' success.

The policies and procedures outlined in this handbook have been designed for general information only and the topics covered are subject to change without advance notice. Please take time to review the policies contained in this handbook. If you have questions, feel free to ask your supervisor or to contact the Human Resources Department.

We are pleased to welcome you as a member of VitalCore Health Strategies!

Sincerely,

A handwritten signature in black ink that reads "Viola Riggan".

Viola Riggan  
Chief Executive Officer

## MISSION

To establish a culture that recognizes the value of each patient, team member, and client through product and service excellence that results in the most positive clinical experience.

## VISION

To define benchmarks for the industry utilizing core values, strong partnerships, effective clinical practices, and innovative healthcare strategies.

## CORE VALUES

### *CONTINUOUS IMPROVEMENT*

We continuously raise our expectations to what is possible and seek out new opportunities for individual and organizational growth. We are committed to being an industry leader through the development of leaders within our Company. We apply our learning to the future, using both our achievements and our setbacks as a path to continued success.

### *THE PURSUIT OF EXCELLENCE*

We take pride in what we do, and a job well done. We are committed to consistently achieving the highest levels of performance and execute by saying what we will do, doing what we say, and documenting our results establishing clear accountability.

### *SENSIBLE COST MANAGEMENT*

We will make careful and prudent value-based decisions concerning expenses and how we use the resources entrusted to us.

### *TEAM CONCEPT*

Although we praise and reward individual achievement, team success is priority, and we will set aside personal ambitions to make sacrifices for the good of the team. We share ideas, opinions and expertise openly within our Company as well as with our Clients. We believe that collaboration and participation in the decision-making process achieves the best results.

### *HONESTY AND INTEGRITY*

The highest standards of honesty and integrity will permeate our business decisions and actions. We provide an atmosphere of respect, fairness, and trust by treating others as we would like to be treated. We will conduct our business in a manner that promotes transparency, encouraging open and honest discussions between all parties.

### *HUMILITY*

We will not permit personal or corporate arrogance to dictate our decisions or impede progress towards success. We seek an accurate assessment of both our strengths and opportunities for improvement.

## GUIDING PRINCIPLES

### ***First Impressions***

You never get a second chance to make one...so make it a good one. They set the tone for every future interaction.

### ***Do It Right the First Time***

Take the time to ensure the job is done with excellence the first time.

### ***All Work Is Important***

Never think you are too big to do a job...we are a service company here to serve others.

### ***One Step Ahead***

Anticipate expressed and unexpressed needs of others.

### ***Care What Others Think***

Listen to people's needs with an open mind considering their perspective first.

### ***Seize the Opportunity***

View every interaction as an opportunity to impress.

### ***Clock It***

Be respectful of others time and deliver exceptional service with a sense of urgency.

### ***Connect***

Take a moment to fully engage with others...listen, laugh, remember their name, and encourage them.

### ***Communicate***

Always keep others accurately informed, so they don't make incorrect assumptions about details in the absence of good information.

### ***Say "Thank You"***

Customers and team members have many options, so continuously thank them for their service and good work.

### ***Smile***

Be somebody's reason to smile! People can hear a smile in your voice and want to be around those that enjoy life...so get the job done; but have fun while you do it.

### ***The Little Things***

Look for opportunities to personalize service with the “little things” that create memorable experiences.

### ***No Interruptions***

Our customers are not an interruption to our work...they are the reason we have work!

## **Employment at Will**

Employment at VitalCore Health Strategies (hereby also known as “Company” or “VitalCore Health Strategies”) is on an at-will basis unless otherwise stated in a written individual employment agreement signed by the Chief Executive Officer of the company.

This means that either the employee or the Company may terminate the employment relationship at any time, for any reason, with or without notice.

Nothing in this employee handbook is intended to or creates an employment agreement, express or implied. Nothing contained in this, or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period. In addition, no company representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, that changes the at-will relationship.

Any salary figures provided to an employee in annual or monthly terms are stated for the sake of convenience or to facilitate comparisons and are not intended and do not create an employment contract for any specific period.

Nothing in this statement is intended to interfere with, restrain, or prevent concerted activity as protected by the National Labor Relations Act. Such activity includes employee communications regarding wages, hours, or other terms or conditions of employment. VitalCore Health Strategies employees have the right to engage in or refrain from such activities.

## **Quality Initiatives**

VitalCore Health Strategies’ quality initiatives include continuously raising our expectations to identify what is possible and seek out new opportunities for clinical growth. Working within a safety and security-oriented system requires an ongoing commitment to form collaborative teams and strong partnerships. Our years of experience providing effective healthcare has taught us to view each interaction with the clients and patients we serve as an opportunity to provide quality services that work. We understand oversight of correctional healthcare and other complex healthcare systems. We seek to redefine the benchmarks and set the bar high in effective healthcare practices, which will provide us a competitive advantage.

## **Equal Opportunity and Commitment to Diversity**

### **Equal Opportunity**

VitalCore Health Strategies provides equal employment opportunities to all employees and applicants for employment without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, or service in the military. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

VitalCore Health Strategies expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Human Resources Department. The VitalCore Health Strategies does not tolerate any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels they have been subjected to any such retaliation, they should bring it to the attention of the Human Resources Department.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to:

- Shunning and avoiding an individual who reports harassment, discrimination or retaliation;
- Express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
- Denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

Complaints of discrimination should be filed according to the procedures described in the **Workplace Violence, Harassment & Retaliation Prevention** section.

### **Americans with Disabilities Act (ADA) and Reasonable Accommodation**

To ensure equal employment opportunities to qualified individuals with a disability, VitalCore Health Strategies will make reasonable accommodations for the known disability of an otherwise qualified individual, unless undue hardship on the operation of the business would result. Employees and applicants who may require a reasonable accommodation should contact the Human Resources Department.

## **Commitment to Diversity**

VitalCore Health Strategies is committed to creating and maintaining an inclusive workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is an important principle in sound business management and is embodied in company policy and VitalCore Health Strategies business practices.

## **Proprietary Information and Confidentiality**

### **Ethics & Compliance**

All employees are expected to protect and enhance the assets and reputation of VitalCore Health Strategies. Our business and reputation is founded on a strong tradition of trust and respect. We believe our employees are our most valuable asset. Employee performance is pivotal in developing and maintaining strong partnerships with our customers and drives the continuous growth of our organization. Developing loyal relationships with our employees, our clients, and the patients we serve is a key aspect of our business model.

Team members face constant challenges in the complex correctional environments in which we serve, often requiring quick responses under high pressure. Honesty and integrity are cornerstones of ethical behavior, and trustworthiness and dependability are essential in lasting relationships.

The policy of the Company is to comply in all respects with applicable federal, state and local laws and regulations. Each employee should refrain from any activity that might violate, or appear to violate, these laws and regulations. Violations will be addressed and could result in disciplinary action, up to and including termination.

### **Conflicts of Interest**

VitalCore Health Strategies expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical behavior, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Exactly what constitutes a conflict of interest, or an unethical business practice is both a moral and a legal question. VitalCore Health Strategies recognizes and respects the individual employee's right to engage in activities outside of employment which are private in nature and do not in any way conflict with or reflect poorly on the company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with a manager for advice and guidance on how to proceed. The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

- Simultaneous employment by another firm that is a competitor of or supplier to VitalCore Health Strategies without VitalCore Health Strategies' authorization.
- Conducting company business with a firm in which the employee, or a close relative of the employee, has a substantial ownership or interest.
- Holding a substantial interest in, or participating in the management of, a firm to which the company makes sales or from which it makes purchases.
- Borrowing money from customers or firms, other than recognized loan institutions, from which our company buys services, materials, equipment, or supplies.
- Accepting substantial gifts or excessive entertainment greater than \$25.00 per person from an outside organization or agency.
- Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
- Participating in civic or professional organization activities in a manner that divulges confidential company information.
- Misusing privileged information or revealing confidential data to outsiders.
- Using one's position in the company or knowledge of its affairs for personal gains.
- Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.

## **Health Insurance Portability & Accountability Act (HIPAA)**

VitalCore Health Strategies is committed to compliance with the standards set forth by the Health Insurance Portability & Accountability Act (HIPAA). We take our obligations under HIPAA very seriously and require all employees to adhere to the following standards:

- Protect computer access by ensuring unattended workstations are locked;
- Secure all doors (ensure no doors are propped open)
- Do not share passwords and/or ID badges – all employees are required to wear their ID badges at all times;
- No patient information is to be left unattended in the open at any time;
- Patient information should only be shared through an encrypted or secure method.
  - Ex. Email correspondence should be encrypted, and the subject line should not include personally identifiable information.
  - Ex. Any correspondence sent using ground mailing delivery service, or being hand carried by nonmedical staff outside the clinic/facility should be enclosed, sealed and marked as CONFIDENTIAL.

Any HIPAA concerns should be directed to the employee's direct supervisor immediately.

## **Proprietary Information and Confidentiality**

The protection of proprietary and/ or confidential business information and trade secrets is vital to the interests and success of VitalCore Health Strategies. Confidential information is any and all information disclosed to or known by you because of employment with the company that is not generally known to people outside the company.

An employee who improperly uses or discloses trade secrets or confidential business information will be subject to disciplinary action up to and including termination of employment and legal action, even if they do not personally benefit from the disclosed information.

All inquiries from the media must be referred to the Corporate Office.

*This provision is not intended to, and should not be interpreted to, prohibit employees from discussing wages and other terms and conditions of employment if they so choose.*

## **Employment Guidelines & Policies**

### **Access to Personnel Files**

Employee files are maintained at the worksite under the guidance of the Human Resources department and are considered confidential. Managers and supervisors may only have access to personnel file information on a need-to-know basis. Personnel file access by current employees and former employees upon request will generally be permitted within 3 days of the request unless otherwise required under state law. Personnel files are to be reviewed in the Human Resources department. Employee files may not be taken outside the department. Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information.

### **Attendance**

All employees are expected to report on time to their designated workstation and be ready to work every day they are scheduled.

If an employee is unable to report to work, they must notify their supervisor as far in advance as possible, but no later than four (4) hours prior to the start of their scheduled shift. Employees must speak to their immediate supervisor/manager; speaking to a co-worker does not satisfy this requirement. An employee must call in for themselves and make a concerted effort to reach their supervisor Voicemail and e-mail messages are not acceptable except in certain emergency circumstances. Excessive absenteeism or tardiness will result in discipline up to and including termination. Failure to show up or call in for a scheduled shift without prior approval may result in termination. If an employee fails to report to work or call in to inform the supervisor of the absence for 3 consecutive days or more, the employee will be considered to have voluntarily resigned employment.

## Bulletin Boards

All required governmental postings are posted on the boards located in the break room or area designated by the facility administration. These boards may also contain general announcements.

Employees must submit any notices of general interest for approval by the Human Resources Department or facility designee prior to posting. Human Resources Department or facility designee approves, posts, and takes down all notices. The company reserves the right to refuse permission to post or to take down any announcement.

## Clocking In and Out

Unless you have received approval from your supervisor, do not clock in prior to seven (7) minutes before your scheduled start time or clock out later than seven (7) minutes past your quitting time.

## Computers, Internet, Email, and Other Resources

The company provides a wide variety of communication tools and resources to employees for use in daily business activities. Whether it is the telephone, voicemail, fax, scanner, Internet, intranet, e-mail, text messaging, or any other company-provided technology, use is reserved for business-related matters during working hours. All communication using these tools should be handled in a professional and respectful manner. At some of our sites the host client (i.e., City, County, State) provides computers, telephones, other business machines, and connectivity through their resources. Use of the client's equipment, network, Internet, or Intranet access, or WiFi is subject to the host client policies and rules. Violations of host client policies and rules may result in revoked clearance and work privileges at the facility or discipline up to and including termination.

Employees should have no expectation of privacy in their use of company computer, phone, or other communication tools. All communications made using company-provided equipment or services including email and internet activity, are subject to inspection by the company. Employees should keep in mind that even if they delete an email, voicemail or other communication, a copy may be archived on the company's systems.

Employee use of company-provided communication systems, including personal e-mail and internet use that are not job-related have the potential to drain, rather than enhance, productivity and system performance. You should also be aware that information transmitted through e-mail and the internet is not completely secure or may contain viruses or malware, and information you transmit and receive could damage the company's systems as well as the reputation and/or competitiveness of the company. To protect against possible problems, delete any e-mail messages prior to opening that are received from unknown senders and advertisers. It also is against company policy to turn off antivirus protection software or make unauthorized changes to system configurations installed on company computers. Violations of this policy may result in termination for a first offense.

The company encourages employees to use e-mail only to communicate with fellow employees, suppliers, customers, or potential customers regarding company business. Internal and external e-mails are considered business records and may be subject to federal and state recordkeeping requirements as

well as to discovery in the event of litigation. Be aware of this possibility when sending e-mails within and outside the company.

All use of company-provided communications systems, including e-mail and internet use, should conform to our company guidelines/policies, including but not limited to the Equal Opportunity, Harassment, Confidential Information, and Conflicts of Interest. Employees may not engage in harassing or discriminatory behavior that targets other employees or individuals because of their protected class status or make defamatory comments. Similarly, employees may not divulge confidential information such as trade secrets, client lists, or information restricted from disclosure by law on social media sites.

Because e-mail, telephone and voicemail, and internet communication equipment are provided for company business purposes and are critical to the company's success, your communications may be accessed without notice by Information Technology department administrators and company management to ensure compliance with this guideline.

The electronic communication systems are not secure and may allow inadvertent disclosure, accidental transmission to third parties, etc. Sensitive information should not be sent via unsecured electronic means.

Office telephones are for business purposes. While the company recognizes that some personal calls are necessary, these should be kept as brief as possible and to a minimum. Personal use of the company's cell phones, long-distance account, or toll-free numbers is strictly prohibited. Abuse of these privileges is subject to corrective action up to and including termination.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment as protected under the National Labor Relations Act. Employees have the right to engage in or refrain from such activities.

## **Corrective Disciplinary Actions and Definitions**

The Company expects employees to comply with the Company's standards of behavior and performance and to correct any noncompliance with these standards.

Under normal circumstances, VitalCore Health Strategies endorses a policy of progressive discipline through the form of coaching in which it attempts to provide employees with notice of deficiencies and an opportunity to improve. It does, however, retain the right to not follow this progressive approach. This policy does not modify the status of employees as employees-at-will or in any way restrict the Company's right to bypass the disciplinary procedures suggested.

The following steps are suggested in the discipline procedure. All steps should be documented in the employee's personnel file.

**Step 1: Informal Discussion.** When a performance problem is first identified, the nature of the problem and the action necessary to correct it should be thoroughly discussed with the employee.

**Step 2: Counseling.** If the informal discussion with the employee has not resulted in corrective action, following a thorough review, the supervisor should meet with the employee and (a) review the problem,

(b) permit the employee to present his or her views on the problem, (c) advise the employee that the problem must be corrected, (d) inform the employee that failure to correct the problem will result in further disciplinary action which may include termination, and (e) issue a counseling notice to the employee.

**Step 3: Reprimand.** If satisfactory performance and corrective action are not achieved under Steps 1 and 2, the supervisor and his or her manager should meet with the employee and proceed via (a) through (d) above and issue a reprimand notice to the employee.

**Step 4: Suspension.** Supervisors have the authority to temporarily remove employees from the workplace, with or without pay, if approved in advance by the Director of Operations and Human Resources. An employee generally may not be suspended without pay for less than a full day, and the suspension must be related to written workplace conduct rules applicable to all employees, e.g., such as a written policy prohibiting sexual harassment or workplace violence.

**Step 5: Failure to improve.** Failure to improve performance or behavior after the written warning or suspension may result in termination.

The progressive disciplinary procedures described above may also be applied to an employee who is experiencing a series of unrelated problems involving job performance or behavior.

In cases involving serious misconduct, or any time the supervisor determines it is necessary, such as a major breach of policy or violation of law, the procedures contained above may be disregarded. The supervisor should contact the Director of Operations and Human Resources to alert them to the misconduct. In these circumstances, the Director of Operations may authorize immediate suspension (with or without pay). Human Resources and the Director of Operation or their designees will conduct an investigation of the incidents leading up to the suspension and determine if any further action, such as termination, should be taken. The Director of Operations will determine when the suspension may be ended, and the employee returned to duties. Employees will receive a formal written notice from Human Resources within 3 business days after a suspension is initiated.

## Credentials

It is the policy of VitalCore Health Strategies that all personnel providing clinical services for VitalCore must maintain current credentials. Employee position descriptions will list license requirements. It is the responsibility of each team member to ensure their licenses are up-to-date and properly reported to their department head or site manager. Corporate Human Resources will monitor compliance with this policy.

## Customer Facilities

When our and healthcare providers think of VitalCore Health Strategies, they think not only of the services we provide, but also the quality of our employees. Therefore, it is important and expected when a VitalCore employee is at a customer or provider facility, they abide by the rules and regulations of that facility, paying particular attention to safety and security policies and procedures.

## Dress and Grooming

VitalCore Health Strategies provides a casual yet professional work environment for its employees. Even though the dress code is business casual, it is important to project a professional image to our customers, our patients, visitors, and coworkers. All employees are expected to dress in a manner consistent with good hygiene, safety, and good taste. Please use common sense.

If a customer or provider facility mandates a certain dress code (i.e.: blue scrubs, non-skid tennis shoes, etc.), our employees are required to follow the facilities guidelines. This may include requirements to maintain natural hair coloring, cover tattoos, or remove visible piercings.

Any questions or complaints regarding the appropriateness of attire should be directed to the Human Resources department. Decisions regarding attire will be made by the Human Resources department and not by individual departments or managers.

## Employee Grievances

VitalCore Health Strategies encourages employees to engage with each other in ways that foster a supportive and pleasant work environment. When concerns among or between staff arise, employees are encouraged to talk to each other to resolve their grievances. When this is not possible, employees are able to file a formal grievance using the procedure outlined in VCHS Admin Policy A 06.1 Employee Grievances. Employees who wish to remain anonymous, may do so.

Under no circumstances will a VitalCore Health Strategies employee be retaliated against in any way for invoking the Employee Grievance Procedure in good faith to seek the resolution of a dispute. VitalCore Health Strategies managers who engage in such retaliation will be subject to discipline under the appropriate VitalCore Health Strategies disciplinary procedures outlined in the Employee Handbook.

The VitalCore Health Strategies Employee Grievance Policy and Procedure does not in any way alter the at-will employment status of VitalCore Health Strategies employees. VitalCore Health Strategies and its employees are always free to terminate the employment relationship at any time for any lawful reason and employment is not for any specific or definite duration.

## Employment Classification (Full-time, Part-time, PRN)

In order to determine eligibility for benefits and overtime status and to ensure compliance with federal and state laws and regulations, VitalCore Health Strategies expects employees to adhere to the employment classifications as shown below. VitalCore Health Strategies may review or change employee classifications at any time.

**Exempt.** Exempt employees are paid on a salaried basis and are not eligible to receive overtime pay.

**Nonexempt.** Nonexempt employees are paid on an hourly basis and are eligible to receive overtime pay for overtime hours worked.

**Salaried.** Salaried employees are paid a fixed amount of compensation.

**Hourly.** Hourly employees are paid an hourly rate for compensation.

**Regular, Full-Time.** Employees who are not in a temporary status and work a minimum of 30 hours weekly and maintain continuous employment status. Generally, these employees are eligible for the full-time benefits package and are subject to the terms, conditions, and limitations of each benefits program.

**Regular, Part-Time.**

Employees who are not in a temporary status and who are regularly scheduled to work fewer than 30 hours weekly, but at least 20 hours weekly, and who maintain continuous employment status. Part-time employees may be eligible for some of the benefits offered by the company and are subject to the terms, conditions, and limitations of each benefits program.

**Temporary, Full-Time.**

Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project and who are temporarily scheduled to work the company's full-time schedule for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status.

**Temporary, Part-Time.**

Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project and who are temporarily scheduled to work fewer than 30 hours weekly for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status.

**PRN, As Needed.**

Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project and who are temporarily scheduled to work the company's full- or part-time schedule for a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status.

PRN employees are not eligible for benefits unless, except otherwise required by applicable law. PRN employees do not accrue PTO or sick leave. PRN employees are eligible for Holiday Pay.

Any PRN employee who does not pick up a shift in a 90-day period will be warned of potential termination per company policy and will have 2 weeks to pick up a shift. If after 2 weeks the employee does not pick up a shift, employment is voluntarily terminated.

## **Employment of Relatives and Domestic Partners**

Relatives and domestic partners may be hired by the company if (1) the persons concerned will not work in a direct supervisory relationship, and (2) the employment will not pose difficulties for supervision, security, safety, or morale. For the purposes of this policy, “relatives” are defined as spouses, children, siblings, parents, or grandparents. A “domestic partnership” is generally defined as a committed relationship between two individuals who are sharing a home or living arrangements.

Current employees who marry each other or become involved in a domestic partnership will be permitted to continue employment with the company provided they don’t work in a direct supervisory relationship with each other or otherwise pose difficulties as mentioned above. If employees who marry or live together do work in a direct supervisory relationship with each other, the company will attempt to reassign one of the employees to another position for which they are qualified if such a position is available. If no such position is available, the employees will be permitted to determine which one of them will resign from the company.

## **Employment Selection**

VitalCore Health Strategies employs individuals who are, in its best judgment, best qualified to fill available positions. All applicants for employment with VitalCore are required to complete an employment application and final selection of employees rests with the department head of the individual contract site, and in some instances, his or her supervisor.

All individuals will be employed after a bona fide offer of employment provided the following conditions have been met:

1. Verification of references, licenses, and qualifications;
2. Satisfactory completion of a drug test;
3. Satisfactory completion of a background investigation; extent of the check depends on the specific site.

## **Healthcare Services for Visitors, Correctional, and Contract Associates**

Only emergency medical first aid will be provided to visitors, correctional, and contract associates by VitalCore employees.

Healthcare employees (practitioners, nursing, mental health, and dental) will not provide non-emergent care to anyone other than the incarcerated patients admitted at the facility VitalCore is contracted to provide care.

Contractual obligation will vary from contract to contract regarding provision of inoculations, vaccinations, pre-employment physical examinations, annual screenings, and mental health interventions. When a VitalCore facility is contracted for this type of specific care, this non-emergency care will be provided.

## **Hepatitis B Vaccine**

It is the policy of VitalCore Health Strategies to offer the Hepatitis B vaccine to all employees of VitalCore upon hire. Employees must complete a Hepatitis B Vaccine Consent/Declination form during completion of new hire paperwork. Employees who accept the vaccine must complete the entire series of vaccinations in order for the vaccine to be effective.

## **Job Opportunities**

It is the intent of the Company to place each employee in a position best suited to their talents, skills, and capabilities where optimum productivity and satisfaction can be realized. It is VitalCore's practice to post job openings within the company whenever possible. Employees can review job postings placed on the Company website at [www.vitalcorehs.com](http://www.vitalcorehs.com) and through various recruitment websites as selected by VitalCore Health Strategies.

Employees can always inquire, in confidence, to Human Resources about positions available; however, when an employee formally applies for a promotion or transfer, they must inform their supervisor of their intention.

Promotions or transfers are not typically approved while an employee is in their orientation period (90 days) or is currently in or has received a Corrective Action Plan within the previous six (6) months. Employees who are promoted or transferred must satisfy a three (3) month period in their new role before requesting transfer to another position.

## **Job Performance**

Communication between employees and supervisors or managers is very important. Discussions regarding job performance are ongoing and often informal. Employees should initiate conversations with their supervisors if they feel additional ongoing feedback is needed.

## **Annual Incentives**

Annual incentives are determined usually in December of each year and are voted to and agreed upon by VitalCore's Executive Management Team. Incentives are based on VitalCore's financial performance and individual contract stability, and not on the performance of the individual.

## Onboarding & Orientation

This employee handbook is provided as a means of orienting new employees to VitalCore Health Strategies. Additionally, your supervisor will provide onboarding as to your specific job duties and responsibilities, work area, restrooms, equipment, supplies, introduction to co-workers, etc. You are encouraged to ask questions and you will find your supervisor able and willing to answer questions and to assist you as you familiarize yourself with the environment and job duties.

Every VitalCore employee goes through an initial orientation period to learn about the Company and specific job duties. During this time, the employee will have the opportunity to find out if they are suited to, and like their new position. This period also gives the supervisor a reasonable amount of time to evaluate the new employee's performance. The initial period of employment is the ninety (90) day orientation period.

Provided job performance is satisfactory at the end of this period, the employee will continue in our employment as an at-will employee.

## Outside Employment

Employees are permitted to work a second job so long as it does not interfere with their job performance with VitalCore Health Strategies. Employees with a second job are expected to work their assigned schedules. A second job will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours.

If outside work activity causes or contributes to job-related problems, it must be discontinued, or the employee may be subject to disciplinary action, up to and including termination.

Any employment with a competitor, supplier of services, or customer of VitalCore Health Strategies must be approved by the Director of Operations at the time of hire with VitalCore Health Strategies, or prior to commencing the outside employment if already a VitalCore Health Strategies employee. Failure to obtain this approval may result in termination.

## Problem Resolution

VitalCore Health Strategies supports an "open door" policy that allows for effective two-way communication at all levels of the organization. Positive working relationships depend upon mutual understanding of Company goals and objectives. If a team member is concerned by circumstances regarding his or her employment or feels he or she is not being treated fairly in accordance with Company policy, a means of redress is available in the form of problem resolution. Employees can raise concerns and make reports without fear of retaliation. However, the employee does have the obligation to continue to work normally without interrupting current job responsibilities during this process.

## Safety

Employee safety and well-being are a primary concern of VitalCore Health Strategies. VitalCore Health Strategies partners with our clients to ensure accident prevention is a priority in every facility operation.

Each employee is expected to maintain an awareness of their personal safety in the work area and to report any condition which may appear to be hazardous. Any and all accidents causing injury to an employee should be reported immediately to your manager or Human Resources. Employees will complete Injury Report forms as required.

## Security Clearance

Your employment is contingent upon initial and maintained security clearance as defined by site institutional policies. Any VitalCore employee whose security clearance is terminated will no longer be employable by VitalCore Health Strategies and will be terminated. An employee who has their security clearance temporarily suspended for cause may be suspended without pay by the site Director of Operations pending resolution of the issue(s) that resulted in suspended security clearance.

## Separation from Employment

In all cases of voluntary resignation (one initiated by the employee) employees are asked to provide a written notice to their supervisors. Employees who hold positions as facility supervisors (i.e. Health Service Administrators, Director of Nursing, Mental Health Coordinator, Medical Director) or above are required to provide a written 30 calendar day notice. All other employees are required to provide a written 14 calendar day notice to their supervisor. Employees providing the required amount of notice will be considered to have resigned in good standing and generally will be eligible for rehire.

In most cases, Human Resources or the supervisor will conduct an exit meeting on or before the last day of employment to collect all company property, and to discuss final pay. If applicable, information regarding benefits continuation through the Consolidated Omnibus Budget Reconciliation Act (COBRA) will be sent to the employee's home address.

Should it become necessary because of business conditions to reduce the number of employees or work hours, this will be done at the discretion of the company.

## Social Media Acceptable Use

VitalCore Health Strategies encourages employees to share information with co-workers and with those outside the company for the purposes of gathering information, generating new ideas, and learning from the work of others.

Social media provides inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the company has established the following guidelines for employee participation in social media.

Employees should be aware of the effect their actions may have on their images, as well as VitalCore Health Strategies' image/reputation.

**Note:** As used in this policy, "social media" refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, Instagram, and Snap Chat, among others.

### **Off-duty use of social media**

Employees may maintain personal websites or weblogs on their own time using their own equipment. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas. However, employees must ensure that social media activity does not negatively affect their work productivity, work reputation, or relationships with clients or co-workers.

### **Video recording or voice recording**

Recordings made of any telephone calls, meetings, or events of any kind must receive prior approval from the Chief Executive Officer (CEO). Any person performing unauthorized recording(s) of any type in the process of performing their duties, or in any context related to VitalCore, will be reprimanded to include up to termination. Any employee knowing of any unauthorized recording(s) of any type must report it to the Health Services Administrator (HSA) immediately.

### **On-duty use of social media**

Employees may engage in social media activity during work time provided it is directly related to their work, approved by their manager, and does not identify or reference company clients, customers, or vendors without express permission. The company monitors employee use of company computers and the Internet, including employee blogging and social networking activity.

### **Respect**

Demonstrate respect for the dignity of the company, its owners, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid inappropriate comments. For example, employees should not divulge VitalCore Health Strategies confidential information such as trade secrets, client lists, or information restricted from disclosure by law on social media sites. Similarly, employees are prohibited from engaging in harassing or discriminatory behavior that targets other employees or individuals because of their protected class status or make defamatory comments. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

### **Post disclaimers**

If an employee identifies himself or herself as a company employee or discusses matters related to the company on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the company and that the employee is expressing only his or her personal views. For example: "The views expressed on this website/Weblog are mine alone and do not necessarily reflect the views of my employer." Place the disclaimer in a prominent position and repeat it for each posting expressing an opinion related to the company or the company's business. Employees must keep in mind that if they post information on a social media site that is in violation of company policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.

Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized VitalCore Health Strategies spokesperson at the Corporate Office.

### **Competition**

Employees should not use social media to criticize the company's competition and should not use it to compete with the company.

### **Confidentiality**

Do not identify or reference company clients, customers, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

### **New ideas**

Please remember that new ideas related to work, or the company's business belong to the company. Do not post them on a social media site without the company's permission.

### **Links**

Employees may provide a link from a social media site to the company's website during employment (subject to discontinuance at the company's sole discretion). Employees should contact the Web design group to obtain the graphic for links to the company's site and to register the site with the company.

### **Trademarks and copyrights**

Do not use the company's or others' trademarks on a social media site or reproduce the company's or others' material without first obtaining permission.

### **Legal**

Employees are expected to comply with all applicable laws, including but not limited to, Federal Trade Commission (FTC) guidelines, copyright, trademark, and harassment laws.

### **Discipline**

Violations of this policy may result in discipline up to and including immediate termination of employment.

*Note:* Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees, or to improve or discuss terms and conditions of employment, such as wages, working conditions, and benefits.

## Solicitation

Employees should be able to work in an environment that is free from unnecessary annoyances and interference with their work. In order to protect our employees and visitors, solicitation by employees is strictly prohibited while either the employee being solicited or the employee doing the soliciting is on “working time.” “Working time” is defined as time during which an employee is not at a meal, on break, or on the premises immediately before or after his or her shift.

Employees are also prohibited from using equipment to make, or distributing written materials, handbills, or any other type of literature on working time and, in working areas, which includes all office areas. Working areas do not include break rooms, parking lots, or common areas shared by employees during non-working time.

Non-employees may not trespass or solicit or distribute materials anywhere on company property at any time.

## Work-Related Injuries

If you are injured on the job, however minor you may think it is, it is your responsibility to report the injury and incident to your immediate supervisor at once. The supervisor will complete an injury report with input from the employee and return the form to the Human Resources department. Human Resources will file the claim with the insurance company. Human Resources will document the injury and notify the Company’s Workers Compensation carrier. Any medical claims or time off related to the injury will be handled through the insurance company.

Workers’ compensation is a “no-fault” system that provides compensation for medical expenses and wage losses to employees who are injured or who become ill because of employment.

VitalCore Health Strategies pays the entire cost of workers’ compensation insurance. The insurance provides coverage for related medical and rehabilitation expenses and a portion of lost wages to employees who sustain an injury on the job.

The company abides by all applicable state workers’ compensation laws and regulations.

Workers’ compensation benefits (paid or unpaid) will run concurrently with FMLA leave, if applicable, where permitted by state and federal law. In addition, employees will not be paid vacation or sick leave for approved absences covered by the company’s workers’ compensation program, except to supplement the workers’ compensation benefits such as when the plan only covers a portion of the employee’s salary as allowed by state law.

## Pay Policies

### **Compensation**

The compensation philosophy of the Company is to pay all employees fairly for the work they perform. Pay rates are determined from many factors including education, experience, responsibility, and market value. To determine external equity, periodic reviews are completed to verify fair market values are comparable and competitive.

### **Deductions from Pay**

Certain mandatory deductions will be made from your pay for federal, state, and local taxes and FICA (Social Security and Medicare). These deductions are required by law. In addition, for eligible employees, you may arrange for payroll deductions to cover such matters as your contributions to your 401(k) plan, medical/dental plan, as well as other benefit-related deductions. These deductions require your written consent. The Company must comply with court ordered wage attachments or garnishment and will withhold wages accordingly.

### **Direct Deposit**

Paychecks will be directly deposited into any bank or financial institution of your choice. Initial set up and changes may be made in the payroll system. Employees needing assistance with this process may contact payroll staff for guidance. Any overpayments or errors may be withheld.

### **Employee Travel, Expense Reimbursement & Mileage**

You must have your manager's authorization prior to incurring an expense on behalf of VCHS. To be reimbursed for all authorized expenses, you must submit an expense report accompanied by itemized receipts and approved by your manager. Original receipts must be attached to the Expense Reimbursement Form in date order and logged on the report in the same date order. If a receipt is not available, a written explanation must be approved and attached. Please do not tape, copy, or write over items amounts or totals. The supervisor will forward approved reimbursement requests to the Corporate office. The employee and supervisor are responsible for ensuring the form is correct and fully completed, detailing official business reasons with the proper documentation and receipts attached.

When employees travel on official company business, expenses will be paid by the employee and later reimbursed. Travel advances will not be issued unless approved by the Director of Operations.

Employees authorized to use their own personal vehicle for travel may be reimbursed for mileage at the rate designated by the Company Accounting department. Mileage traveled must clearly show the miles traveled daily. Odometer or trip meter readings are not necessary. It is not acceptable to lump mileage into one daily total.

The employee should retain a copy of the Expense Reimbursement Form and the accompanying documentation for his/her own records and submit the original form and receipts to their direct supervisor for approval.

## **Business Travel**

Business travel is defined as travel occurring anywhere in the world by a VitalCore employee for the purpose of furthering the business of the company and at the direction of the company. Business travel begins when the employee leaves their residence or work location and ends when the employee returns to their residence or work location, whichever occurs first.

Examples of authorized business travel:

- Clinic inspections and interviews
- Industry conferences, meetings, tradeshows, and business events
- Client and vendor visits
- Sales/new business related
- Training

## **Reasonable Expenses**

Reasonable travel expenses are the ordinary and necessary expenses of traveling while on company-related business away from home or work location.

An ordinary expense is one that is common and accepted for the purposes of conducting business. A necessary expense is one that is helpful and appropriate for you to conduct business. Sufficient information must be provided to establish a valid business purpose for travel, entertainment, or other business expense. Any questions regarding the interpretation of "reasonable expenses" or exceptions should be directed through your VitalCore chain of command to the Corporate office and ultimately for a decision. For the purpose of this policy the Chief Operating Officer is the designee in the absence of the CEO.

## **General Travel Information**

Employees should communicate with their immediate supervisor to determine when work-related travel is necessary and to obtain written supervisory approval in advance of incurring travel-related expenses. To effectively manage company travel expenses, employees are required to make travel arrangements as far in advance as possible to take advantage of purchase discounts. Employees are expected to use the lowest, logical fares and rates available.

Vacation taken in conjunction with work travel should be pre-approved by the immediate supervisor. Any additional hotel, airfare, or ground transportation costs will be the responsibility of the employee.

**Expenses that are personal in nature should not be included with business expenses or receipts.**

### Air Transportation

For Calendar years 2021 and 2022 up to \$500.00 Coach class or any discounted fare is appropriate and approved by this policy. Premium fares, such as first/business class, may be appropriate at times and must be approved by the CEO or designee. Employees may upgrade themselves at their own expense. If a business trip is cancelled after an airline ticket has been issued, employees are expected to use the same ticket for a future business trip. Unused tickets or flight coupons should never be discarded or destroyed as they may hold cash value.

### Ground Transportation

The most cost effective, safe, and efficient ground transportation should be used. An intermediate or smaller car type should be appropriate for an individual traveler. For Calendar year 2021 and 2022 up to \$50.00 per day is approved for automobile rentals. Exceptions are allowed for 3 or more people traveling together and any large trade show transports up to \$89.00 per day. All operators must be at least 21 years of age and have a valid driver's license on file with Human Resources.

Rental cars are covered under the company's automobile insurance plan. **Do Not** accept the optional insurance. Rental cars should be returned with a full tank of gas and in the condition in which it was received.

Employees using their personal vehicles for business travel must provide proof of adequate liability insurance annually and a valid driver's license to Human Resources. This information must be updated upon each renewal. Reimbursement will be based on the mileage rate published by VitalCore. For the Calendar year 2021 and 2022, the reimbursement rate for mileage is \$.52 cents per mile. The mileage rate covers gasoline, repairs, and wear, etc. Receipts are required for taxi, Uber, shuttles, and parking fees. Receipts are not required for tolls. Tipping up to \$3.00 per transport event for baggage handling, and bell service is allowed without receipt. Tipping up to \$5.00 for taxi and other vehicle transportation is approved without receipts per each transport. Employees will not be reimbursed for parking tickets, fines for moving violations, towing fees, or auto repairs.

### Lodging

Standard lodging accommodations will be single occupancy. An employee may accept room upgrades if there is no additional charge to the company. For Calendar year 2021 and 2022, hotel room daily rates should not exceed \$150 per night not including taxes without prior approval from the employee's direct supervisor in normal travel areas. High expense travel area (such as Chicago, Washington DC, New York) rates should not exceed \$250.00 not including taxes and must be pre-approved by the direct supervisor responsible for coordinating the travel.

Lodging may **NOT** be shared with business associates, other employees, non-business guests (other than family), customers, or vendors. Lodging costs for non-business guest should be paid outside of any connection with VitalCore and with personal funds or a personal credit card. Purchase of hotel rooms that includes family members should not exceed the normal expected travel of the individual. (i.e. Single room with 2 beds is acceptable, vacation homes under the limit amount would also be acceptable). Employees are personally responsible for damages and incidentals. Hotel and/or vacation rental purchases for City, County, State, or Federal agency employees is strictly prohibited.

## **Alcohol, Meals, and Entertainment**

Depending on the particular circumstances under which the expenses are incurred, expenses for alcohol, meals, and entertainment will be either a business or personal expense. Federal regulations require that these expenses be treated appropriately. All questions related to the appropriateness of alcohol, meals, and entertainment should be directed to the CEO and/or their designee through your VitalCore chain of command.

### **Alcohol**

While not encouraged, small or moderate amounts of alcohol may be considered a business expense. For Calendar year 2021 and 2022, alcohol will be reimbursed at a not to exceed amount of \$20.00 as a portion of a meal expense. Employees should remember that they represent the interest of VitalCore Health Strategies and therefore should never engage in excessive alcohol consumption while on business. Poor behavior as a result of excessive alcohol consumption could result in corrective action up to and including termination. Any questions regarding the alcohol policy should be directed to the CEO and/their designee through your VitalCore chain of command.

### **Meals**

A reimbursable business meal is defined as a meal consumed by an employee and/or other invited attendees while conducting company business. A business meal is also defined as any meal consumed by the employee while traveling for business. For Calendar year 2021 and 2022, business meal expenses are reimbursed as follows:

Breakfast not to exceed \$15.00 including all food and drinks, before tip, and is approved between 3:00am and 11:00am.

Lunch not to exceed \$25.00 including all food and drinks, before tip and is approved between 11:00am and 4:00pm.

Dinner not to exceed \$50.00 including all appetizers, food, and drink (to include alcohol) before tip and is approved between 4:00pm and 3:00am.

Business meal receipts should be detailed and itemized. Restaurant chit sheets or credit card tear sheets are not acceptable. Receipts should contain each item purchased, and include the date, time, company name, and names of attendees.

Tips and gratuities included in the meal receipt are reimbursable. All tips should be appropriate to location, service level, and local protocol. For Calendar year 2021 and 2022, customary tips should be 18% but will not be reimbursed for tips over 20%.

### **Entertainment**

Entertainment of a vendor is a reasonable expense if the entertainment is meant to further company business and is legal. Entertainment should be reasonable in relation to the resulting business benefit expected to be derived from the expense. No employee is permitted to host or sponsor parties for the purpose of entertainment without prior authorization from the CEO.

It is in poor form, if not illegal in some jurisdictions, to provide entertainment, in the form of cash, events, transportation, sleeping accommodations, alcohol, or food items to clients. Therefore, no employee shall be allowed to spend any personal or business monies on any of these items for any city, county, state, or federal agency employee, representative, or lobbyist.

### **Expense Documentation**

All employee expense reimbursement requests must be submitted via the use of the VitalCore Health Strategies Expense Report Form. The primary responsibility for expense documentation rests with the employee requesting reimbursement. For audit purposes, all receipts should be detailed and itemized. For meals and entertainment, include a list of attendees, their company name, documentation of business purpose, and the type of activity for entertainment receipts.

### **Reimbursable and Non-Reimbursable Expenses**

Reimbursable and non-reimbursable expenses are listed below. This list is not all-inclusive. There may be similar or additional expenses not listed. Provided that expenses are reported in a timely manner and correct, (*see Expense Report Form*) the employee will be reimbursed for the additional items below. All questions should be directed to the CEO or designee through your VitalCore chain of command.

**The following ARE reimbursable:**

Air freight for business purposes

Lodging

Meals (must include names and titles of persons entertained, date, description of entertainment and the business purpose).

Business office expenses (fax, copying services, etc.)

Gasoline (rental cars ONLY)

Mileage for personal cars

Reasonable tips for ground transportation, meals, skycap, bellhop, shuttle drivers, etc.

Tolls when driving rental or personal cars for business trips

Airport parking fees

Internet connectivity in hotels and other public places

**The following are NOT reimbursable:**

First Class Airline seating (unless free upgrade)

Airline Club Memberships

Hotel recreational activities

Vacation expenses incurred taken in conjunction with a business trip

Barbers, Hair and Nail Services

Spa Services & Treatments

Clothing (even if lost or stolen)

Laundry/Valet Service

Magazine, Books, Newspapers

Movies/Games (in flight and/or hotel)

Gifts or payments to state, local, or federal government and/or representatives are strictly prohibited, even if made at employee's own personal expense.

Travel expenses must be submitted within seven (7) days of the date of travel. Any expenses submitted after that date will not be reimbursed without approval from the CEO or their designee.

Expense Reimbursement checks will be processed with the regular payroll processing that the report is received, if submitted prior to the processing deadlines. If not submitted by the deadline, it will be processed on the following pay cycle.

## Meal and Rest Breaks

Whenever practical, employees should receive a fifteen (15) minute rest break period each day at approximately the middle of every four (4) hours not broken by a meal period. Break periods of less than twenty (20) minutes are considered paid work time. However, you are required to be punctual in starting and ending rest breaks. If you choose not to take a break, you are not entitled to leave before the end of your normal schedule unless approved by the supervisor. Employees may not combine break periods for the purpose of coming in late, leaving early, or extending lunch periods. Employees are not permitted to leave the premises during break periods. Any allowable smoking at the facility may be done during the 15-minute break periods. Employees are not entitled to take extra breaks for smoking throughout their scheduled work shift.

Whenever practical, employees should take a thirty (30) minute meal break period each shift of six (6) hours or more. Meal periods are intended to be uninterrupted and are considered unpaid time. A second meal break is allowable after the thirteenth (13<sup>th</sup>) hour on a shift. If an employee is unable to take a meal break, or their meal break is interrupted by a facility emergency, they must inform their immediate supervisor in person or in writing before they complete their current shift. Employees may receive disciplinary action for working through their lunch without authorization from the supervisor or without a legitimate work-related necessity. Employees are to clock out for meal breaks. Employees are permitted to leave the premises during meal periods for most facilities (as long as business needs allow as designated by each contract) but must clock-out and clock-in any time they leave the premises.

## Overtime

Non-exempt employees are not permitted to work in excess of their regularly scheduled work hours without prior approval from the supervisor. Overtime compensation is paid to all non-exempt employees in accordance with applicable laws. Overtime is based on hours worked in excess of 40 hours during a one-week pay period. Overtime pay excludes any paid time off hours taken during that week. Regularly scheduled holiday time is counted as time worked.

Overtime hours are permitted for priority or emergency reasons with approval by the supervisor or manager.

If excessive hours occur earlier in the week, the manager may authorize time off later in the week, to keep the workweek at 40 hours. This will occur only if scheduling permits.

## Paychecks

### **Payday and Pay Periods**

Employees are paid biweekly, every other Friday. Pay periods are considered a two (2) week period and each week starts on Sunday at 12:00am and ends on Saturday at midnight. All hours must be entered, reviewed, and approved by the manager and submitted to Human Resources/Payroll no later than 12:00pm Central Standard Time on the Monday following the last day of the pay period to ensure timely processing. If not approved (including timecards, expense/mileage reimbursements), they will be unpaid and processed with the following pay cycle provided all necessary approvals are obtained.

### **Shift Pay**

Based on operational needs, shift differentials may be paid for specific employment categories at specific facilities.

### **Time Reporting and Timecards**

Most sites use a computerized timekeeping system to track hours worked by each employee. Accordingly, you must record your time using the Company's computerized timekeeping system. For hourly employees unless you have received approval from your supervisor do not clock in prior to seven (7) minutes before your scheduled start time or clock out later than seven (7) minutes past your quitting time.

Employees may not clock in or out for anyone else and may not allow anyone else to clock in or out for themselves. This is considered a very serious offense and may be grounds for discipline up to and including termination.

Salaried employees will have a written work schedule approved by their supervisor. Any deviations from the work schedule will be authorized by the supervisor.

### **Hours of Work**

The Company maintains office hours consistent with client needs and at a reasonable cost to maintain our competitive position. Each employee will have a work schedule, which may include any of the seven (7) days of the week, depending on your position, department, and work status. Each department or facility will have individual operating requirements that are subject to change. It will be necessary to schedule working hours and lunch breaks to meet operational demands. Your supervisor will inform you of your schedule.

All employees are expected to be at designated work area at the assigned starting time, ready to work. You are required to notify your supervisor any time you are unable to be at work during your normal work hours. Most medical units provide continuous service seven (7) days a week. It is the expectation of VCHS that employees may not leave the unit at the end of their shift unless another qualified VCHS employee has properly relieved them if the post requires staffing on the next shift.

## Workplace Safety

### **Commitment to Safety**

VitalCore Health Strategies is committed to the safety of employees, contractors, and the patients we serve. Within all healthcare environments, to include correctional environments, safety and security is the overarching goal that must be met within each environment. Within correctional environments, healthcare staff work collaboratively and in partnership with all facility staff and administrators to ensure both staff and patient safety.

VitalCore promotes a patient safety culture that encourages staff to identify opportunities to reduce harm or potential harm to patients by establishing strong systems with ongoing monitoring to prevent near-miss or adverse clinical events. Patient safety systems focus on strategies that improve clinical practice and promote patient safety in a non-punitive, professional, and supportive environment.

The facilities we work in will also have safety policies and rules created by the host client. Employees are expected to abide by all site safety policies and rules. If an employee believes a conflict exists between facility policies and VCHS policies, they should notify their supervisor or site manager.

### **Drug-Free and Alcohol-Free Workplace**

VitalCore Health Strategies, in compliance with the Federal Drug-Free Workplace Act of 1988, has adopted the following guidelines which must be adhered to as a condition of employment. To preserve security and to protect the personal safety of fellow employees, volunteers, incarcerated individuals, and the public, employees shall not be permitted to perform their duties or enter the premises of facilities or offices while under the influence of alcohol, the illegal use of drugs, and/or controlled substances. The unlawful use, possession, manufacture, dispensation, or distribution of controlled substances in VitalCore work locations is prohibited.

1. Possession, use, sale, or transfer of illegal drugs, medically unauthorized drugs, controlled substances, or unauthorized alcohol on VitalCore premises, or when conducting VitalCore business is prohibited and will be grounds for discipline up to and including termination.
2. Any employee under the influence of alcohol, illicit or non-prescribed drugs, or prescription medications that impair judgement, performance, or behavior while on VitalCore premises or during VitalCore business will be subject to discipline up to and including termination.
3. Employees are expected to cooperate in personal or facility searches for alcohol and illegal drugs when requested. Employees and sub-contractors must submit to medical evaluations, and alcohol/drug testing where judgement or performance appears to be impaired, behavior is erratic, or in the case of special circumstances such as a work-related accident. Refusal to cooperate with any of these procedures may subject an employee to discipline up to and including termination.
4. It is the responsibility of each employee to seek assistance prior to reaching a point where judgment, performance, or behavior is impaired. The responsibility for maintaining acceptable

levels of performance and conduct in the workplace is the sole responsibility of each employee. It is each employee's responsibility to ensure that work will not be affected by taking prescribed medication. If an employee is unable to work safely because of prescribed medication, a statement by the prescribing physician allowing the individual to return to work is required. Any medical issues will be kept confidential by the supervisor and Human Resources.

5. Employees are required to report any observed or suspected illicit drug activity on company or facility premises to Human Resources and appropriate site officials.
6. Prior to employment, the following guidelines will be utilized:
  - a. All prospective employees and subcontractors will be tested for the presence of illegal or medically unauthorized drugs or controlled substances. The site supervisor/manager will advise prospective employees regarding the procedures for pre-employment testing when testing is required. A confirmed positive test will preclude eligibility for employment or contract.
  - b. It is the responsibility of each employee to conduct themselves safely, and chemically unimpaired at the worksite. If an employee identifies the need to engage in substance use/abuse treatment, they will be granted a leave of absence for this purpose, subject to the VitalCore Time Off policy guidelines. If any employee needs assistance in seeking help, the Human Resources Director will provide contacts for community resources.
7. Employees exhibiting abnormal or unusual behavior and suspected of being under the influence of intoxicating substances, or misuse of drug or other substances, while on duty may be subject to Reasonable Suspicion Testing. The employee will be taken to a private area to observe and discuss concerning behaviors. Examples of impaired or unusual concerning behaviors could be:
  - Slurred speech,
  - poor coordination,
  - unsteady walk,
  - sleeping/nodding,
  - sudden change in behavior pattern,
  - tendency to become confused,
  - irritability,
  - abnormal fluctuations in mood and energy,
  - impairment of job performance,
  - poor timekeeping,
  - increase in short-term sickness absence,
  - deterioration in relationships with other people,
  - missing medications from the facility,
  - strong odor of alcohol on person's breath or
  - a client has requested a test based on credible concerns.

In the interest of safety, at least two people (both at the level of supervisor and/or an HR Rep) must transport the employee to a medical examination and/or test site. If the employee refuses testing or medical examination (if determined necessary), refusal to cooperate will, in the absence of convincing contrary evidence, force the company to draw its own inferences, basing its findings on available information. If the employee refuses to cooperate, and it is deemed that they cannot return to work, and it is believed that they are not safe to drive from the workplace, additional options may include:

- Call a family member if the employee agrees, or
- Call a cab to provide transportation for the employee to his/her home.
- Contact building security or the police department if the employee becomes uncooperative and attempts to leave on his/her own.

## **PREA**

The Prison Rape Elimination Act of 2003 (PREA, P.L. 108-79) was enacted by Congress to address the problem of sexual abuse of persons in the custody of U.S. correctional agencies. The Act applies to all public and private institutions that house adult or juvenile offenders and is also relevant to community-based agencies. It addresses both inmate-on-inmate sexual abuse as well as staff sexual misconduct.

On June 23, 2009, the National Prison Rape Elimination Commission released and forwarded to the U.S. Attorney General its final report and proposed standards to prevent, detect, respond to and monitor sexual abuse of incarcerated and detained individuals. VitalCore's major role in the provisions of PREA include:

- A zero-tolerance standard for the incidence of sexual assault and rape of an incarcerated individual; and
- To follow standards set forth for the detection, prevention, reduction, treatment, and reporting of prison rape.

Each correctional setting will have specific policies and procedures regarding PREA and associated training targeting detection, reporting, and treatment of PREA-related cases. Employees are expected to comply with all training requirements to achieve and/or maintain security clearance to work at the facility. Engaging in behavior that is prohibited under the PREA rules may result in criminal investigation and prosecution. VCHS will refer cases to local law enforcement as warranted.

## Fraternization

Fraternization is sexual misconduct or undue familiarity with a patient or incarcerated individual. Sexual behavior that is directed by an employee toward an incarcerated individual may include acts or attempts to commit acts of sexual abuse, sexual contact, sexual assault, unlawful sexual relations, and sexual harassment. It also includes conversations or correspondence that demonstrates or suggests a romantic or intimate relationship between the incarcerated individual and the employee. Whether or not the incarcerated individual “consents” or “initiates the behavior” is irrelevant in determining if sexual misconduct has occurred as, sans an actual assault on the employee, sexual contact of any nature, is ALWAYS the responsibility of the employee.

Undue familiarity is a conversation, contact, personal or business dealing between an employee and incarcerated individual which is unnecessary, not a part of the employee's duties, and related to a personal relationship or purpose other than a legitimate correctional purpose.

Undue familiarity includes horseplay, betting, trading, dealing, socializing, family contact unrelated to the employee's duties, sharing or giving food, delivering, or intending to deliver contraband, personal conversation, exchanging correspondence, sexual misconduct, or in any other manner developing a relationship with an incarcerated individual which is anything other than an employee/patient professional relationship. Engaging in any form of fraternization with an incarcerated individual will subject an employee to disciplinary action up to and including termination.

Employees introducing illegal or unauthorized items into the facility or engaging in inappropriate relationships with incarcerated individuals may be subject to criminal prosecution. VCHS may also report inappropriate boundaries or behavior, and illegal behavior to the appropriate state licensing boards.

## Workplace Violence

VitalCore endorses a work environment that respects the dignity, safety and security of the employees, is conducive to productive job performance and is free from threats and violence. Every employee is responsible for contributing to a positive and productive environment by maintaining a safe workplace.

Below is a list of behaviors, while not all inclusive, that is prohibited.

- Engaging in aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress
- Causing physical injury to another person
- Verbally threatening remarks or acts
- Written threats
- Intentionally damaging employer property or property of another employee
- Possessing a weapon on site or targeted and intimidating discussion of weapons

Displaying signs of extreme agitation, hostility, anger or irrational or inappropriate behavior that others could reasonably perceive as creating a threatening environment.

Employees are responsible for notifying their supervisor of any actual or perceived threats or behavior which they have witnessed or received.

Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. If you commit such acts, you will be subject to disciplinary action, up to and including termination, and possible prosecution.

## **Harassment & Retaliation Prevention**

Sexual and other unlawful harassment is a violation of Title VII of the Civil Rights Act of 1964 (Title VII), as amended, as well as many state laws. Harassment based on characteristics protected by law, such as race, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law, is prohibited.

It is VitalCore Health Strategies' policy to provide a work environment free of sexual and other harassment. To that end, harassment of VitalCore's employees by management, supervisors, coworkers, or nonemployees who are in the workplace is prohibited. Further, any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. VitalCore Health Strategies will take all steps necessary to prevent and eliminate unlawful harassment.

### **Definition of Unlawful Harassment.**

"Unlawful harassment" is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities because of the individual's membership in a protected class.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law.

### **Definition of Sexual Harassment.**

"Sexual harassment" is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual's employment or as a basis for employment decisions; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment.

While it is not possible to list all circumstances that may constitute sexual harassment, the following are some examples of conduct that, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwanted sexual advances, whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comments about an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, or cartoons;
- Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments;
- Inquiries into one's sexual experiences; *and*
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated at VitalCore Health Strategies.

#### **Complaint Procedure.**

Any employee who believes they have been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. You may complain directly to your immediate supervisor or department manager, the Human Resources department, or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

All complaints will be investigated promptly and, to the extent possible, confidentiality.

If the investigation confirms conduct contrary to this policy has occurred, VitalCore Health Strategies will take immediate, appropriate, corrective action, including discipline, up to and including immediate termination.

## **Smoke-Free Workplace**

Due to the acknowledged hazards arising from exposure to environmental smokes and chewing tobacco, it is VCHS's policy to promote a smoke and chewing tobacco free environment for all employees, customers, and visitors.

As medical evidence indicates, smoking poses a significant risk to both the smoker and non-smoker. For this reason, smoking (including electronic cigarettes or "e-cigarettes, vape pens) is prohibited in all company facilities and on all client facility grounds.

## **Inclement Weather & Emergency Closings**

We recognize that emergency situations, to include inclement weather can affect normal business operations. Employees are expected to make every possible effort to report for work, even under unfavorable conditions. However, you are not expected to jeopardize your personal safety under adverse weather conditions.

When a recognized emergency or inclement weather renders an employee unable to report to work, or cause an early departure from work, employees will be paid for hours worked and may be compensated for lost time by using accrued paid time off. In some cases, employees may be able to arrange make-up time if authorized by the site supervisor or manager. As in the case of any absence from work, you should notify your supervisor of the circumstances.

Employees working in mandatory posts may be mandated to work extra shifts in cases of inclement weather or emergencies. Extra worked hours will be compensated through normal overtime rules for hourly employees. Salaried employees working significant extra hours may have work schedules adjusted later in the week or same pay period with if authorized by the site manager.

## **Time Off**

### **Bereavement**

All employees will be allowed time off in the event of a death in their immediate family. The length of such leave will vary depending on the circumstances and must be approved in advance by management. All regular full-time and part-time employees will be allowed up to three (3) days leave with pay, and a maximum of 8 hours per day. PRN employees will be granted time off without pay. For purposes of Bereavement Leave, immediate family includes spouse, children, grandchildren, brothers, sisters, parents, legal guardian, grandparents of employee, spouse or domestic partner and spouse's parents. Verification of relationship and/or death may be requested, and if requested, must be submitted prior to bereavement leave payment being authorized.

## **Family Medical Leave Act (FMLA)**

Any employee absent (other than scheduled vacation leave and/or sick leave used during an illness) will fall under (1) The Family and Medical Leave Act or (2) personal leave of absence. Request for a leave under the leave of absence/family and medical leave must be made in written form to Human Resources.

VCHS will provide FMLA to its eligible employees. The company provides the mandatory FMLA Notice upon hire and post required notices by the U.S. Department of Labor (DOL) on Employee Rights and Responsibilities under the Family and Medical Leave Act at each site. If you have any questions, concerns, or disputes with this policy, you must contact Human Resources in writing.

FMLA is applicable for any employee who has been employed by VCHS for at least twelve (12) months and has worked at least 1250 hours during the previous twelve (12) month period. The employee must work in a worksite where 50 or more employees are employed by the company within 75 miles of that office or worksite. Eligible employees qualify for up to twelve (12) weeks of unpaid leave. FMLA leave may be taken on an intermittent basis. FMLA is not considered paid leave unless an employee elects to use accrued vacation and/or sick leave during their absence. Employees must give at least thirty 30-day notice of the need for FMLA leave, when foreseeable.

VCHS has designated the twelve (12) month period measured backward from the date an employee's leave first begins.

To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

1. The birth of a child and in order to care for that child.
2. The placement of a child for adoption or foster care and to care for the newly placed child.
3. To care for a spouse, child or parent with a serious health condition (described below).
4. The serious health condition of the employee.
5. To care for a spouse, son, daughter, parent, or next of kin of a current military service member with a serious injury or illness incurred in the line of duty on active duty to take up to 26 work weeks.
6. To allow a leave for qualifying exigencies arising out of the military member's active duty or call to active duty in support of a contingency operation.

When an employee returns from FMLA leave, they will be returned to their position or an equivalent position. Any Company paid group health plan benefits will be maintained during the leave. Employees that participate in the group health plans will continue to pay the employee contributions. Any missed contributions will be deducted from future paychecks. Contact Human Resources for more information concerning the details of the FMLA. The requirements, entitlements, and certifications of the Act will be explained.

## Unpaid Leave of Absence

VCHS expects its employees to attend to personal matters outside of working hours or while out on vacation or sick leave. However, personal circumstances may necessitate an absence from work that extends beyond paid vacation leave and may not qualify under FMLA. Employees may request an unpaid leave of absence not to exceed two weeks, which is subject to approval by the employee's manager in consultation with Human Resources and the CEO or designee.

An unpaid leave of absence will only be granted for reasons of extraordinary circumstances and in some cases may be denied if it will adversely affect the work schedule or regular business operations. The only exceptions to this policy are military leave and jury duty. In such cases where time off is mandated, the employee may choose to use sick leave and/or vacation pay to offset any unpaid leave time until accrued sick leave or vacation is depleted. Any Company paid group health plan benefits will be maintained during the leave. Employees that participate in the group health plans will continue to pay the employee contributions. Any missed contributions will be deducted from future paychecks.

Full Time and Part Time employees are eligible for unpaid leave of absence after completing sixty (60) days of employment with VitalCore.

Consistent with company policy for all unpaid leave, you will not accrue PTO or Sick leave while you are on an unpaid leave. Additionally, you will not be paid for holidays that occur during the unpaid leave period.

If the leave of absence is for an indefinite or extended period of time, and the employee's job must be filled during his or her absence, the employee may be terminated and does not have the right to be rehired after the absence, unless a suitable job opening exists at that time.

## Holidays

VCHS recognizes specific holidays each calendar year. Regular, Full-Time employees are eligible for paid holidays (time off with pay). Employees will be paid for the holiday provided they work a full shift on the scheduled workday before and the scheduled workday after the holiday. Exceptions to this rule may include, excused absences such as preapproved vacation, sick day (other than a leave of absence) supported by a doctor's note, inability to work or office closure due to inclement weather.

VCHS designates seven (9) paid holidays during the calendar year for eligible employees.

Paid company holidays: New Year's Day, Martin Luther King Jr. Day, Memorial Day, Juneteenth, Independence Day, Labor Day, Veteran's Day, Thanksgiving, Christmas

## Jury Duty / Court Appearance

If called to jury duty, the employee must submit the Court Notice and the Proof of Jury Duty to their manager and Human Resources. Time off to perform jury duty will be provided. VCHS will pay up to three (3) days of regularly scheduled time if an employee is out. Employees have the option to use accrued vacation or sick leave. Time off for personal court appearances will not be paid unless the employee uses accrued vacation leave.

## Military Leave

Employees ordered to uniformed service on active-duty status will be granted a leave of absence for up to five years. Employees may be eligible for leave under the FMLA policy. It is the responsibility of the employee to provide the manager with notice of every leave before the leave begins. If advance notice cannot be provided due to extenuating circumstances, the employee must ensure notice is provided via emergency contact and/or family member as soon as possible.

Employees in military service for more than 30 days are required to provide documentation that provides the discharge status and release date for the respective leave within two weeks from the end date of the leave. Employees in military service for 90 days or less will, upon return, be generally restored to the job he or she would have had if employment had not been interrupted by service. Ultimately, job assignment will be based on compliance with applicable law, availability, the employee's qualifications, as well as the business needs of the company.

## Paid Time Off (PTO)

Employees should refer to VitalCore policy, *Paid Time Off A 04.1*

## Voting

Employees will be excused with pay for such time as is reasonably necessary to vote in national, state, and local elections, provided they are not able to reach the polls at a time when they are not scheduled to work.

It is the responsibility of the employee to request time off for voting through their direct supervisor.